

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF OREGON**

In re: Van's Aircraft, Inc., (Debtor)

Case No. 23-62260-dwh11

Claim No: 501

Claimant: Matthew Larson Argument for Allowing FRCP 26(a)(1)

Disclosures in Bankruptcy

**Your Honor,**

This creditor respectfully requests that this Court allow for the application of Federal Rule of Civil Procedure 26(a)(1) initial disclosures in this bankruptcy proceeding.

**Rule 26(a)(1) provides for the automatic and early exchange of critical information, including:**

- **Names and contact information of individuals likely to have discoverable information:** This allows parties to efficiently identify and locate potential witnesses, saving time and resources.
- **Copies of documents that the disclosing party may use to support its claims or defenses:** This promotes transparency and facilitates early assessment of the case, potentially leading to more efficient resolution.
- **Computation of damages with supporting materials:** This provides a clear picture of the alleged damages and allows for informed settlement negotiations.
- **Complex issues:** Refer to reply to: debtor and court (docket #336) from: creditor No. 501 Matthew Larson. As a Pro se creditor needing to make a case Rule 26(a)(1) is essential.

**The benefits of applying Rule 26(a)(1) in bankruptcy are substantial:**

- **Increased Efficiency:** Early disclosure of key information streamlines the discovery process, reducing delays and unnecessary motion practice.
- **Enhanced Settlement Opportunities:** With a better understanding of the case and the positions of the parties, settlement becomes more likely, conserving court resources and minimizing costs for all involved.
- **Fairness and Equality:** Requiring early disclosures ensures that all parties have access to essential information, promoting a level playing field and preventing unfair surprises.
- **Reduced Litigation Costs:** By streamlining the discovery process, Rule 26(a)(1) helps to minimize the overall costs of litigation for both the debtor and creditors.

**While bankruptcy proceedings have unique characteristics, the core principles of fairness, efficiency, and transparency underlying Rule 26(a)(1) are equally applicable.**

**Conclusion:**

This creditor respectfully urges the Court to allow for the application of FRCP 26(a)(1) initial disclosures in this bankruptcy proceeding. Doing so will enhance the efficiency and fairness of these proceedings, promote early resolution, and ultimately serve the best interests of all parties involved.